

**UNITED STATES BANKRUPTCY COURT FOR  
THE WESTERN DISTRICT OF WISCONSIN**

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**In Re:**

**ISRAEL MCKINNEY and  
JENNIFER MCKINNEY**

**Debtors.**

**In Bankruptcy No:**

**Case No: 22-11558**

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**MOTION TO EXTEND TIME TO COMPLY WITH COURT ORDER (DOCKET #144)  
UP AND THROUGH UNTIL OCTOBER 20, 2023**

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Israel and Jennifer McKinney, debtors by their attorneys, PITTMAN & PITTMAN LAW OFFICES, LLC by Greg P. Pittman, hereby move the Court for an additional fourteen days (up and until October 20, 2023) to comply with the Court Order (Docket #144). The Debtors are now in receipt of the post-plan payment agreement with the Internal Revenue Service and the amended chapter 13 plan has been drafted, however some additional time is necessary to make changes and updates to the budget due to the underlying divorce case and the need to consult with multiple parties and their attorneys before final approval can be provided to the undersigned.

Wherefore, the Debtors are requesting the fourteen day extension of time to file an updated budget and modified plan.

**Dated this 6th day of October, 2023 at La Crosse, Wisconsin.**

**PITTMAN & PITTMAN LAW OFFICES, LLC.**

**By: s/Greg P. Pittman**  
**Greg P. Pittman**  
**Attorney for Debtors**  
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